

9010/RHD  
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP  
61 Broadway, Suite 3000  
New York, New York 10006  
(212) 344-7042

Attorneys for Third-Party Defendant Hyundai Merchant Marine Co. Ltd.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FEDERAL INSURANCE COMPANY,  
Plaintiff,

- against -

EXPEDITORS INTERNATIONAL OF  
WASHINGTON, INC.; EXPEDITORS  
INTERNATIONAL OCEAN; EXPEDITORS  
INTERNATIONAL FRANCE SAS;

Defendant.

-----  
EXPEDITORS INTERNATIONAL OF  
WASHINGTON, INC.; EXPEDITORS  
INTERNATIONAL OCEAN; EXPEDITORS  
INTERNATIONAL FRANCE SAS;

Third-Party Plaintiffs,

-against-

HYUNDAI MERCHANT MARINE, LTD.,  
BURLINGTON NORTHERN SANTA FE  
RAILROAD, AIR FRANCE AND FEDEX  
TRADE NETWORKS TRANSPORT &  
BROKERAGE, INC.,

Third-Party Defendant.

07 Civ. 3166 (PKC)

**RULE 7.1 STATEMENT**

Pursuant to the provisions of Fed.R.Civ.P. 7.1, in order to enable the judges and magistrate judges of this Court to evaluate possible disqualification or recusal, I, Randolph H. Donatelli, as a member of the bar of this Court and a member of the firm Cichanowicz, Callan, Keane, Vengrow & Textor, LLP, attorneys for third-party defendant Hyundai Merchant Marine Co. Ltd. (sued incorrectly as "Hyundai Merchant Marine Ltd.") certify upon information and belief that Hyundai Merchant Marine Co. Ltd is a foreign corporation that has no corporate parents, subsidiaries or affiliates that are publicly held.

Dated: New York, New York  
September 5, 2007

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE,  
VENGROW & TEXTOR, LLP  
Attorneys for Third-Party Defendant  
Hyundai Merchant Marine Co. Ltd.

By: s/ Randolph H. Donatelli  
Randolph H. Donatelli (RHD-5359)  
61 Broadway, Suite 3000  
New York, New York 10006-2802  
(212) 344-7042